IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 09 - 411

v. : DATE FILED: June 18, 2009

RUEBEN LAMAR GOBER, : VIOLATIONS:

a/k/a "Lamar Evans," 18 U.S.C. § 371 (conspiracy – 1

a/k/a "Umar," : count)

ANTHONY RAHEEM JACKSON 18 U.S.C. § 472 (possession of

: counterfeit currency with intent

to defraud -2 counts)

: 18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture

:

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about April 1, 2009, until on or about April 2, 2009, in the Eastern District of Pennsylvania, defendants

RUEBEN LAMAR GOBER, a/k/a "Lamar Evans," a/k/a "Umar," and ANTHONY RAHEEM JACKSON

conspired and agreed, together and with others unknown to the grand jury, to commit offenses against the United States, that is, to: (a) sell, exchange, transfer and deliver false, forged, and counterfeited obligations of the United States with the intent that they be passed and used as true and genuine, and (b) to possess and conceal false, forged, and counterfeited obligations of the United States with the intent to defraud, in violation of Title 18, United States Code, Sections 472 and 473.

MANNER AND MEANS

It was a part of the conspiracy that:

- 2. Defendants RUEBEN LAMAR GOBER and ANTHONY RAHEEM JACKSON agreed to sell, exchange, transfer, and deliver counterfeit Federal Reserve Notes ("FRNs") in Bensalem Township, Pennsylvania, with the intent that they be passed and used as true and genuine.
- 3. Defendant RUEBEN LAMAR GOBER arranged to sell the counterfeit FRNs for genuine currency, charging only a fraction of the counterfeit currency's "value."
- 4. Defendants RUEBEN LAMAR GOBER and ANTHONY RAHEEM JACKSON then transported the counterfeit currency for delivery.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants RUBEN LAMAR GOBER and ANTHONY RAHEEM JACKSON, and others unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

- 1. On or about April 1, 2009:
- a. a person working with law enforcement (hereinafter, the "buyer") agreed with defendant RUBEN LAMAR GOBER, known to the buyer only as "Umar," that defendant GOBER would sell counterfeit FRNs having a face value of \$1,000 to the buyer in exchange for \$300 genuine United States currency from the buyer; and
- b. the buyer and defendant GOBER agreed that the exchange would occur the next day at the Neshaminy Motor Inn, 2345 Old Lincoln Hwy, Trevose, in Bensalem

Township, Pennsylvania.

- 2. On or about April 2, 2009:
- a. there were telephone calls between the buyer and defendant RUBEN LAMAR GOBER during which they re-negotiated the transaction and agreed that defendant GOBER would sell counterfeit FRNs having a face value of \$5,000 to the buyer in exchange for \$700 genuine currency, plus an additional \$50 in gas money, and that the exchange would occur at the same place and time, and defendant GOBER stated that his "little cousin" would accompany him to the exchange;
- b. at approximately 6:20 p.m., defendants GOBER and ANTHONY RAHEEM JACKSON arrived together at the Neshaminy Motor Inn in a car registered to defendant GOBER;
- c. before getting out of the car, defendant GOBER removed thirty counterfeit \$20 FRNs and one counterfeit \$10 FRN from the armrest of his car and handed the counterfeit FRNs, having a total face value of \$610, to defendant JACKSON;
- d. after getting out of the car, defendant GOBER removed a small box from the trunk, and defendants GOBER and JACKSON walked together to the room number provided by the buyer;
- e. when defendants GOBER and JACKSON reached the room, defendant JACKSON was carrying the box;
- f. defendant JACKSON knocked on the door, saw law enforcement was present, and then threw the box away from himself. The box was later found to contain 118 counterfeit \$50 FRNs, nine counterfeit \$20 FRNs, and 30 counterfeit \$10 FRNs, for a total face

value of \$6,380 in counterfeit FRNs. The counterfeit FRNs contained in the box were printed on an Epson All-in-One printer, serial number KNTP081405, that was located at defendant JACKSON's residence along with genuine currency attached to a sheet of copy paper and two sheets of uncut counterfeit currency matching both the genuine currency attached to the copy paper and the counterfeit currency found in the box.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 2, 2009, in Bensalem Township, in the Eastern District of Pennsylvania, defendants

RUEBEN LAMAR GOBER, a/k/a "Lamar Evans," a/k/a "Umar," and ANTHONY RAHEEM JACKSON,

with intent to defraud, concealed and possessed, and aided and abetted the concealment and possession of, falsely made, forged, and counterfeited obligations of the United States, that is, \$6,990 in counterfeit \$50, \$20 and \$10 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 2, 2009, in Bensalem Township, in the Eastern District of Pennsylvania, defendant

RUEBEN LAMAR GOBER, a/k/a "Lamar Evans," a/k/a "Umar,"

with intent to defraud, concealed and possessed, and aided and abetted the concealment and possession of, a falsely made, forged, and counterfeited obligation of the United States, that is, one counterfeit \$10 Federal Reserve Note.

In violation of Title 18, United States Code, Sections 472 and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 472, as set forth in this indictment, defendants

RUEBEN LAMAR GOBER,
a/k/a "Lamar Evans,"
a/k/a "Umar,"
and
ANTHONY RAHEEM JACKSON

shall forfeit to the United States of America all counterfeits of any obligations of the United States and any articles, devices or other things made, possessed, or used in the commission of this offense, and any material and apparatus used or fitted or intended to be used, in the making of such counterfeits, articles, devices or things, found in defendants' possession without authority from the Secretary of the Treasury, including, but not limited to: (a) one Epson All-in-One printer, serial number KNTP081405; and (b) all genuine currency bearing serial numbers that match the counterfeit currency found in defendants' possession.

A TRUE BILL:
FOREPERSON

All pursuant to Title 18, United States Code, Section 492.